

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

REVISED INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL  
SERVICE TO PR/USPS-T8-1, REDIRECTED FROM WITNESS RACHEL – ERRATA  
(March 16, 2012)

The United States Postal Service hereby revises its response to interrogatory PR/USPS-T8-1, redirected from witness Kevin Rachel. Specifically, the Full Time Equivalent (FTE) associated with maintenance personnel savings of “6,542.6” has been corrected to “6,449.4.” The correction stems from revisions filed yesterday to the Direct Testimony of Marc. A Smith on Behalf of the United States Postal Service (USPS-T-9) and to library reference USPS-LR-N2012-1/24, which in turn resulted from revisions that witness Dominic Bratta made to library reference USPS-LR-N2012-1/31.<sup>1</sup> A full version of the response follows.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Pricing & Product Support

Nabeel R. Cheema

---

<sup>1</sup> See USPS-LR-N2012-1/31 REVISED – Maintenance Materials in Support of USPS-T-5, Docket No. N2012-1 (Feb. 24, 2012).

475 L'Enfant Plaza, S.W.  
Washington, D.C. 20260-1137  
(202) 268-7178; Fax -5402  
March 16, 2012

**REVISED INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO PUBLIC REPRESENTATIVE INTERROGATORIES,  
REDIRECTED FROM WITNESS RACHEL**

**PR/USPS-T8-1**

Please provide the total current number of Full Time Equivalent (FTE) employees and an estimate of the number of non-managerial FTEs that would need to be eliminated in order to implement the proposal in this docket by the following categories.

- a. FTE Clerks.
  - i. Current Total
  - ii. Estimated Number Required to be Eliminated
- b. FTE Mail Handlers
  - i. Current Total
  - ii. Estimated Number Required to be Eliminated
- c. FTE Motor Vehicle Operators
  - i. Current Total
  - ii. Estimated Number Required to be Eliminated
- d. FTE Maintenance Personnel
  - i. Current Total
  - ii. Estimated Number Required to be Eliminated

**RESPONSE:**

FTE represents the full time equivalent of all work-hours in an employee category divided by the average number of hours worked by a full time employee in a year.

Current Total FTEs provided below reflect an average for FY2011. This is based on the CRA development of labor costs, as provided in Docket No ACR 2011, USPS-FY11-7.

In response to each part ii, below, we have provided the amount of FTEs consistent with the savings put forth in the testimonies of witnesses Smith, USPS-T-9, and Bradley, USPS-T-10. As such, FTEs in this context do not equate to the number of staff to be "eliminated". It is the FTE reductions consistent with the savings.

**REVISED INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO PUBLIC REPRESENTATIVE INTERROGATORIES,  
REDIRECTED FROM WITNESS RACHEL**

- a.    i   155,627.0
- ii   9,184.1
- b.    i       50,419.2
- ii       6,132.0
- c.    i       7,808.7
- ii       1,387.2
- d.    i       40,616.2
- ii       6,449.4